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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DONALD E. MITCHELL JR.,

Case No. 2:16-cv-00037-RFB-NJK

Plaintiff,

V.

MIGUEL FLORES, *et al.*,

Defendants.

**DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO FILE
STIPULATION AND PROPOSED
ORDER OF DISMISSAL**

Defendant Miguel Flores-Nava, by and through counsel, Adam Paul Laxalt, Attorney General for the State of Nevada, and Jared M. Frost, Senior Deputy Attorney General, hereby requests an additional thirty (30) days to file a Stipulation and Proposed Order of Dismissal. Defendant's Motion is made and based on Rule 6 of the Federal Rules of Civil Procedure, the following memorandum of points and authorities, the pleadings and papers on file, and any other evidence the Court deems appropriate to consider.

MEMORANDUM OF POINTS AND AUTHORITIES

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Court may extend the time to perform an act within a specified time for good cause shown.

On October 10, 2018, the parties participated in a settlement conference at which a settlement was reached to resolve this matter in its entirety. *See* ECF No. 92. At the conclusion of the conference, the Court ordered the parties to file a stipulation and proposed order for dismissal by November 7, 2018. *Id.*

On October 17, 2018, the undersigned mailed Plaintiff a proposed settlement agreement and a proposed Stipulation and Order for Dismissal with Prejudice for his review and signature. As of the date of this filing, the undersigned has not received a response. Therefore, additional time is needed to communicate with Plaintiff in an effort to determine the cause of the delay and to attempt to resolve any disagreements. For these reasons, Defendants submit there is good cause to extend the time file the stipulation and proposed order for an additional thirty (30) days, or until December 7, 2018.

DATED this 6th day of November, 2018.

ADAM PAUL LAXALT
Attorney General

By: /s/ Jared M. Frost
JARED M. FROST (Bar No. 11132)
Senior Deputy Attorney General

Attorneys for Defendant

ORDER

IT IS SO ORDERED. The parties shall have until December 7, 2018, to file a stipulation and proposed order for dismissal.

DATED: November 7, 2018.

NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE